

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas



United States of America  
v.  
ISAAC AMBE NFORMANGUM

Case No. 4:22-MJ-1539

\_\_\_\_\_  
*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 26, 2022 in the county of Harris in the  
Southern District of Texas, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
Title 18, U.S.C. 115(a)(1)(B)	Threatens to assault, kidnap, or murder, a United States Senator, with intent to impede, intimidate, or interfere with such Senator while engaged in the performance of official duties, or with intent to retaliate against such Senator on account of the performance of official duties.
Title 18, U.S.C. 875(c)	Transmits in interstate or foreign commerce any communication containing a threat to injure the person of another.

This criminal complaint is based on these facts:  
see attached affidavit

☒ Continued on the attached sheet.

Submitted by reliable electronic means, sworn to,  
signature attested telephonically per Fed. R. Crim. P. 4.1.  
And probable Cause found:

  
Complainant's signature

Special Agent Gregory Brown  
Printed name and title

Date: 07/09/2022

  
Judge's signature

City and state: Houston, Texas

U.S. Magistrate Judge Peter Bray  
Printed name and title

4:22-MJ-1539

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Gregory R. Brown, a Special Agent (SA) with the Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows:

**INTRODUCTION**

1. I am a Special Agent of the FBI. I have been a Special Agent with the FBI since April 2003. I am charged with the duty of investigating violations of the laws of the United States, collecting evidence in cases in which the United States is or may be a party in interest, and performing other duties imposed by law. During my assignment with the FBI, I have participated in cases involving violent crimes and threats of violent crimes, as defined in Title 18, United States Code, Section 115(B).

2. This affidavit is offered in support of a criminal complaint charging ISAAC AMBE INFORMANGUM with violating 18 USC § 115(a)(1)(B) (threats to murder a United States official), and 18 USC § 875(c) (threats by wire). The statements in this affidavit are based upon my investigation, information provided to me by other law enforcement officers and my experience and training as a Special Agent of the FBI. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included all facts known to me concerning this investigation.

**PROBABLE CAUSE**

3. Law enforcement officers were notified by United States Capital Police (USCP) that they received a report from the Office of United States Senator **Rafael Edward “Ted” Cruz**. Senator Cruz received a voice message on June 26, 2022 at 12:30 PM CT from 832-834-2312 (“target number”) to Senator Cruz’s Houston office located at 1919 Smith Street # 9047 Houston,

Harris County, Texas 77002. The Caller ID displayed “Cath Nformangum.” The recording was transcribed as follows:

**Voice Message Transcription:**

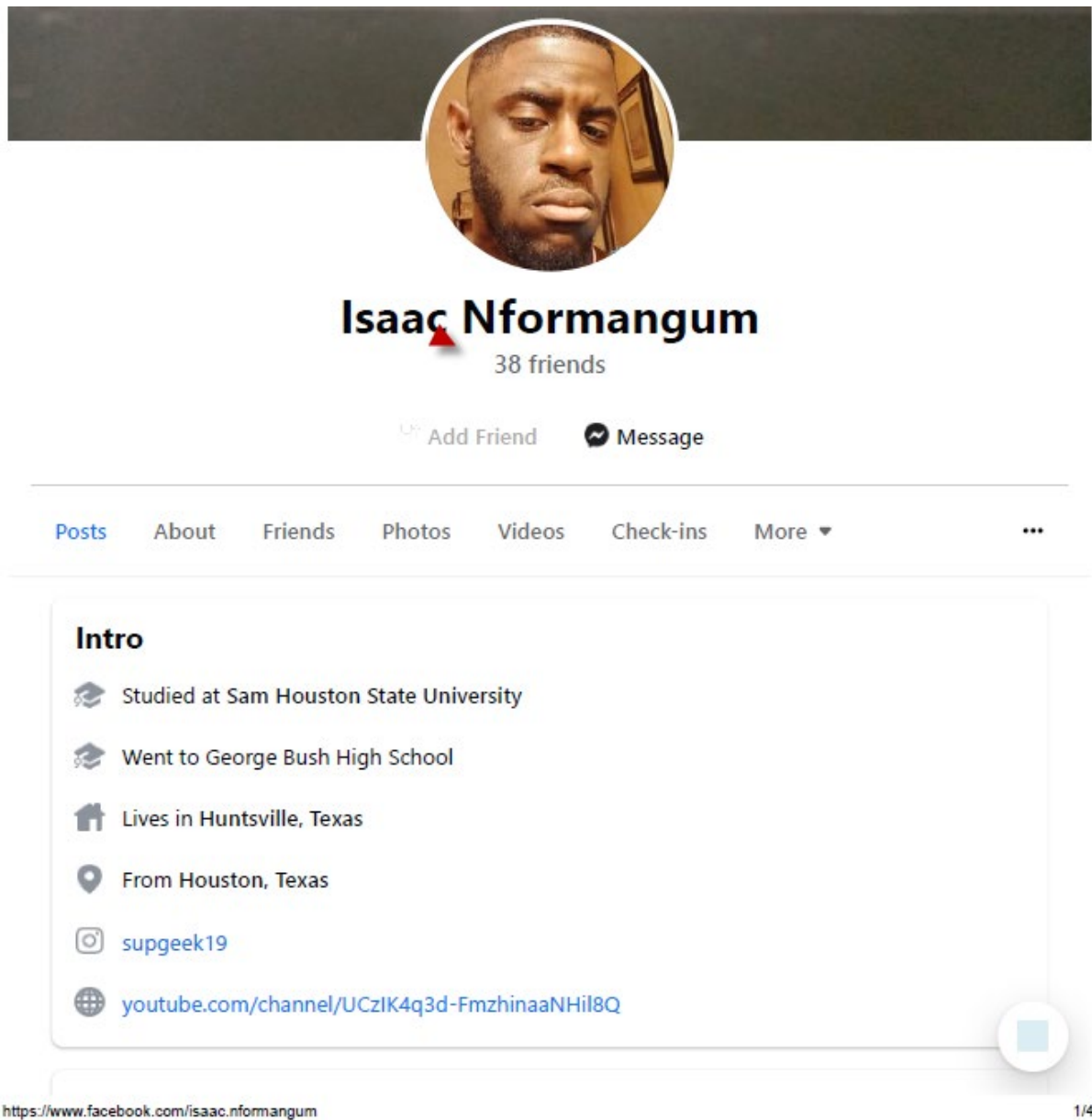
*[Sigh] Okay [spoken quietly]. Hello and good afternoon Senator Rafael. This is one of the many Afro-American constituents of whom you are representative of here in Texas, as you currently serve from the Senate. [Sigh] I have just read the, uh, Texas Republican parties’ platform for this current 2022 year, uh, wherein it is apparent that your many colleagues intend, **intend to have the Voting Rights Act repealed and not reauthorized. Every last one of your Republican colleagues to have signed off on that platform is to be found and, is to be found and killed, be it by a bullet to the face or by the smashing of a brick in your skull. It is a civic duty of every American citizen or resident to see to it that every last one of your colleagues is to be killed. Killed. Be it by finding you in a public space or by trailing you to your very, by your very public homes. The addresses of which are public knowledge. You and every one of your colleagues is to be shot dead. Found and killed. You sick pieces of human scum will not have the fucking audacity to aggress this any further and to strip us of our rights like you did our grandparents so many years ago. You will be found and killed. As a civic duty of every American to do so. Fuck you. Fuck you Rafael. You peace of human scum. [Silence for 30 seconds.]***

4. Affiant learned the following information that was provided by USCP: A search of law enforcement databases for the target number revealed the carrier to be T-Mobile and the subscriber to be Cath Nformangum. Additional law enforcement databases indicated that Cath Nformangum was associated with Isaac Ambe Nformangum, date of birth xx-xx-2000, Texas ID 44004686, and Social Security Number xxx-xx-9694. A search of a separate law enforcement

database for the target number revealed the most recent association with the number was Isaac Ambe Nformangum with an address of 17607 Barton Point Ln., Richmond, TX 77407 (Affiant confirmed the owner of the above residence to be Catherine Nformangum through Fort Bend County Central Appraisal District).

5. Law enforcement officers further learned the following from **Open Source**: A search was conducted of the name Isaac Ambe Nformangum on the search section of Facebook which provided the following:

- a. <https://www.facebook.com/isaac.nformangum> - Name, school, and location all associate to Nformangum.



The image shows a Facebook profile page for Isaac Nformangum. At the top is a circular profile picture of a man with a beard. Below the picture is the name "Isaac Nformangum" in bold black text, followed by "38 friends". There are two buttons: "Add Friend" and "Message". Below these are tabs for "Posts", "About", "Friends", "Photos", "Videos", "Check-ins", and "More". The "Intro" section lists several details: "Studied at Sam Houston State University", "Went to George Bush High School", "Lives in Huntsville, Texas", "From Houston, Texas", an Instagram handle "supgeek19", and a YouTube channel link "youtube.com/channel/UCzIK4q3d-FmzhinaaNHil8Q". At the bottom left is the URL "https://www.facebook.com/isaac.nformangum" and at the bottom right is "1/4".

Isaac Nformangum  
38 friends

Add Friend Message

Posts About Friends Photos Videos Check-ins More

**Intro**

- Studied at Sam Houston State University
- Went to George Bush High School
- Lives in Huntsville, Texas
- From Houston, Texas
- supgeek19
- youtube.com/channel/UCzIK4q3d-FmzhinaaNHil8Q

https://www.facebook.com/isaac.nformangum 1/4

b. <https://www.youtube.com/channel/UCzIK4q3d-FmzhinaaNHil8Q/about>

c. [https://www.instagram.com/supgeek19/?fbclid=IwAR02NfSD2smpsAsT24j-ztARAL8mbruz3qmrMC-XdeaYJnMojmL\\_CP\\_DSM8](https://www.instagram.com/supgeek19/?fbclid=IwAR02NfSD2smpsAsT24j-ztARAL8mbruz3qmrMC-XdeaYJnMojmL_CP_DSM8) – Linked to Facebook account. Set to private. Matching profile picture.

6. Affiant learned of an Instagram account owned by Isaac Ambe Nformangum to show a YouTube video posted by Isaac Ambe Nformangum that was a recording of his voice. Law enforcement officers played the YouTube video audio alongside the above recorded phone call made on June 26, 2022. Affiant and law enforcement officers believe the voice on the recording left on Senator Cruz' voicemail is the same voice heard while watching the YouTube video on the Instagram account associated with **Isaac Ambe Nformangum**.

7. Law enforcement officers made contact with T-Mobile to determine the approximate location where the call was made. An exigent request form was submitted to T-Mobile as part of conspiratorial activities threatening national security interest for cell data records (CDR) with cell sites (last 48 hours). Law enforcement officers received CDR records showing the above call was made from the area of the cell tower located at 7023 Brittmoore Road Houston, Harris County, Texas 77041.

8. On June 28, 2022, Nformangum was arrested at his home for making a Terroristic Threat to Senator Cruz.

9. On June 30, 2022, your Affiant met with Nformangum while he was in custody. Nformangum waived his rights and agreed to speak with your Affiant. In summary, Nformangum stated that he made the call to Senator Cruz on June 26, 2022 while at work. He explained that he was upset after reading the 2022 Texas Republican Platform where in Senator Cruz and others proposed overturning the Federal 1965 Voting Rights Act. In his state of anger, Nformangum

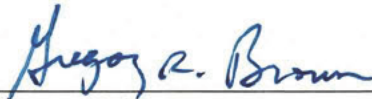
researched Senator Cruz's office telephone number, went to a private area at work, and placed the "very detailed threat to the Senator." During the call and after the call, Nformangum expected some action to be taken by the government, such as being placed on a Watch List. He did not expect any immediate action such as being arrested. He was surprised he was arrested so quickly. He consented to a search of his phone which is a black Samsung Galaxy A10S, manufactured in China. A search of his phone shows that on June 26, 2022, at approximately 12:21pm, he called Senator Cruz's office in Washington, D.C. twice. One of the calls lasted over 1 minute. Directly afterwards, he called Senator Cruz's office in Houston, Texas, where he made the above-mentioned threats. This call lasted over 7 minutes.

### CONCLUSION

10. Based on the facts listed above, there is probable cause to conclude that **Isaac Ambe Nformangum** on or about June 26, 2022, in Harris County, located in the Southern District of Texas, did commit the criminal offenses of:

11. **Title 18 USC, Section 115(a)(1)(B)** (Threatens to assault, kidnap, or murder, a United States Senator, with intent to impede, intimidate, or interfere with such Senator while engaged in the performance of official duties, or with intent to retaliate against such Senator on account of the performance of official duties.) and,

12. **Title 18 USC, Section 875(c)** (Transmits in interstate or foreign commerce any communication containing a threat to injure the person of another.)



\_\_\_\_\_  
Gregory R. Brown  
Special Agent  
Federal Bureau of Investigation

SWORN TO and SUBSCRIBED to me via telephone this 9th day of July, 2022, and I find  
there is probable cause.



\_\_\_\_\_  
Hon. Peter Bray  
UNITED STATES MAGISTRATE JUDGE